

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF EASTERN NEW YORK**

MARTÍN JONATHAN BATALLA VIDAL,  
ANTONIO ALARCON, ELIANA FERNANDEZ,  
CARLOS VARGAS, MARIANO  
MONDRAGON, and CAROLINA FUNG FENG,  
on behalf of themselves and all other similarly  
situated individuals, and MAKE THE ROAD  
NEW YORK, on behalf of itself, its members, its  
clients, and all similarly situated individuals.

*Plaintiffs,*

v.

KIRSTJEN M. NIELSEN, Secretary of the  
Department of Homeland Security, JEFFERSON  
BEAUREGARD SESSIONS III, Attorney General  
of the United States, and DONALD J. TRUMP,  
President of the United States,

*Defendants.*

Case No. 1:16-cv-04756 (NGG) (JO)

**MOTION TO PERMIT  
WITHDRAWAL OF COUNSEL**

**MOTION TO PERMIT WITHDRAWAL OF COUNSEL**

**PLEASE TAKE NOTICE THAT** Jessica R. Hanson, Esquire, hereby moves the Court for an Order, pursuant to Local Rule 1.4 to allow her to withdraw as counsel of record for all Plaintiffs as her employment with the National Immigration Law Center will conclude on August 31, 2018.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court enter an Order granting her motion to withdraw. A proposed order is attached.

Dated: August 27, 2018

Respectfully submitted,

/s/ Jessica R. Hanson  
Jessica R. Hanson (*pro hac vice*)  
NATIONAL IMMIGRATION LAW CENTER

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Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2018 I electronically filed the foregoing Motion to Permit Withdrawal of Counsel and [Proposed] Order granting the same with the Clerk of the Court for the United States District Court for the Eastern District of New York by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Jessica R. Hanson

Jessica R. Hanson (pro hac vice)